

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

YOAN HENRIQUEZ, : Chapter 11
Debtor :
: Bankr. No. 20-12166-pmm

**DEBTOR'S RESPONSE TO THE UNITED STATES TRUSTEE'S
MOTION TO COMPEL THE FILING OF POST-CONFIRMATION REPORTS
AND TO SHOW CAUSE WHY A FINAL DECREE SHOULD NOT BE ENTERED**

Debtor, by and through its counsel, Barry A. Solodky, Esquire and Saxton & Stump,
hereby responds to the Motion as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted. The Debtor is in the process of providing counsel with information to file the required Post-Confirmation Distribution Reports.
6. Admitted. However, the Debtor is providing counsel with information to file the required Confirmation Distribution Reports so as the bankruptcy case will not be dismissed or converted.

WHEREFORE, counsel for the Debtor respectfully requests that the Court deny the Motion of the United States Trustee.

Respectfully submitted,

SAXTON & STUMP, LLC

Dated: November 1, 2022

By: /s/ Barry A. Solodky

Barry A. Solodky, Esquire

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